In their "Reply to Comments" filing of August 20, 2003, the Power Line Communications Association says that "More often, however, the opponents offer only conjecture. No matter how loud opponents may shout, they cannot point to evidence in this country that BPL systems are causing, have caused, or will cause, harmful interference to other spectrum users or other third parties."

Ameren Energy Communications, Inc., who also filed Reply Comments on August 20, shares a similar sentiment: "Most of the charges leveled against BPL in this proceeding to date have been unsubstantiated by empirical evidence, or even relevant literature. "

Neither of these comments was particularly constructive or informative.

The American Radio Relay League, in its "Reply to Comments" filing of the same date, presents actual measurements collected at 4 BPL test areas in the eastern US. These data show that BPL, even operating at Part 15 limits, produces sufficient harmful interference to HF communication so as to render communication in the Amateur bands nearly impossible. Even in areas with underground power lines, BPL created harmful interference to licensed services.

These actual measurements should be more valuable to the FCC than simple unsubstantiated assertions by the two organizations listed above. The FCC is encouraged to read the ARRL's filing and study these data carefully. If possible, the Commission should view the videotape on which the ARRL documents its monitoring. It is the ARRL, not the power companies, who have done scientifically defensible testing of the impacts of BPL technology on licensed radio services.

The BPL providers, in particular Ameren and PLCA, have simply waved their arms without presenting actual data. Simply asserting that BPL does not provide harmful interference does not make it so. I hope that in making its decisions, the FCC values data over armwaving.

If there are actual data to support the assertions of the BPL providers, they should become part of this Docket so they can be evaluated by all taxpayers.

Barring the presentation of any data to substantiate the position of BPL providers, I support NTIA's position that more rigorous testing needs to be done to assess the impact of BPL to HF and low VHF spectrum users. I hope that NTIA, the FCC, ARRL, BPL providers, and other affected licensed users can all cooperate in this testing, so that the testing methods and test results are unambiguous and scientifically defensible. Only then should the FCC permit larger scale deployment of this technology.